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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION,

Case No. 4:22-MD-03047-YGR

MDL No. 3047

THIS DOCUMENT RELATES TO ALL
ACTIONS

**DECLARATION OF LAURA M. LOPEZ
IN SUPPORT OF OMNIBUS SEALING
STIPULATION (JOINT LETTER BRIEF
REGARDING SNAP'S ASSERTION OF
PRIVILEGE IN CONNECTION WITH 14
REDACTED DOCUMENTS)**

Judge: Honorable Yvonne Gonzalez Rogers
Magistrate Judge: Hon. Peter H. Kang

DECLARATION OF LAURA M. LOPEZ

I, Laura M. Lopez, declare and state as follows:

1. I am an attorney with the law firm Munger, Tolles and Olson and represent Snap Inc. (“Snap”) in the above-captioned case. This declaration is based on my personal knowledge. If called upon to do so, I could and would competently testify as follows.

2. The exhibits referenced in the following chart are true and correct copies of the documents bearing the Bates numbers reflected in the chart. Redacted versions of these exhibits were previously filed under seal and unredacted versions were lodged with the Court for in camera review.

3. On January 14, 2025, the Parties filed the Joint Letter Brief Regarding Snap’s Assertion of Privilege in Connection with 14 Redacted Documents (ECF No. 1547) and the Joint Temporary Sealing Motion (ECF No. 1550) and its exhibits (ECF Nos. 1550-1 through 1550-30).

4. I have reviewed the documents Snap seeks to redact and seal pursuant to the Court’s Order Setting Sealing Procedures (ECF No. 341). Based on my review of the Joint Letter Brief and in consultation with Snap, I understand there is good cause to seal the following information:

Document	Basis for Sealing
Joint Letter Brief ECF No. 1550-1	The portion sought to be redacted consists of sensitive and confidential information about Snap’s internal investigation practices, cooperation with law enforcement investigations, and media and communications strategies. Disclosure of this information would provide competitors with insight into Snap’s practices that they would not otherwise have and thereby cause competitive harm to Snap.
Snap’s Exhibit A Bates: SNAP3160953 ECF No. 1550-3	This exhibit contains sensitive and confidential information about Snap’s internal ad review practices, advertising and business strategies, and relationships with advertising partners. Disclosure of this information would provide competitors with insight into Snap’s business that they would not otherwise have and thereby cause competitive harm to Snap.
Snap’s Exhibit B Bates: SNAP3182499 ECF No. 1550-5	This exhibit contains sensitive and confidential information about Snap’s internal ad review practices, advertising and business strategies, relationships with advertising partners, lens product development, and public relations strategies. Disclosure of this information would provide competitors with insight into Snap’s business that they would not otherwise have and thereby cause competitive harm to Snap.

Document	Basis for Sealing
Snap's Exhibit C Bates: SNAP3202222 ECF No. 1550-7	This exhibit contains sensitive and confidential information about Snap's internal moderation practices, lens product development, and business strategies. Disclosure of this information would provide competitors with insight into Snap's business that they would not otherwise have and thereby cause competitive harm to Snap.
Snap's Exhibit D Bates: SNAP3245340 ECF No. 1550-9	This exhibit contains sensitive and confidential information about Snap's internal moderation practices and business strategies. Disclosure of this information would provide competitors with insight into Snap's business that they would not otherwise have and thereby cause competitive harm to Snap.
Snap's Exhibit E Bates: SNAP3307049 ECF No. 1550-11	This exhibit contains sensitive and confidential information about Snap's advertising and user data collection practices. Disclosure of this information would provide competitors with insight into Snap's business that they would not otherwise have and thereby cause competitive harm to Snap.
Snap's Exhibit F Bates: SNAP5288226 ECF No. 1550-13	This exhibit contains sensitive and confidential information about Snap's internal policy enforcement mechanisms, account investigation practices, and cooperation with law enforcement investigations. Disclosure of this information would provide competitors with insight into Snap's practices that they would not otherwise have and thereby cause competitive harm to Snap.
Snap's Exhibit G Bates: SNAP1141054 ECF No. 1550-15	This exhibit contains sensitive and confidential information about Snap's internal investigation practices and cooperation with law enforcement investigations. Disclosure of this information would provide competitors with insight into Snap's practices that they would not otherwise have and thereby cause competitive harm to Snap.
Snap's Exhibit H Bates: SNAP1157465 ECF No. 1550-17	This exhibit contains sensitive and confidential information about Snap's internal investigation practices, cooperation with law enforcement investigations, and media and communications strategies. Disclosure of this information would provide competitors with insight into Snap's practices that they would not otherwise have and thereby cause competitive harm to Snap.
Snap's Exhibit I Bates: SNAP1151790 ECF No. 1550-19	This exhibit contains sensitive and confidential information about Snap's internal account investigation and age verification practices. Disclosure of this information would provide competitors with insight into Snap's practices that they would not otherwise have and thereby cause competitive harm to Snap.
Snap's Exhibit J Bates: SNAP5288836 ECF No. 1550-21	This exhibit contains sensitive and confidential information about Snap's internal account investigation and age verification practices. Disclosure of this information would provide competitors with insight into Snap's practices that they would not otherwise have and thereby cause competitive harm to Snap.
Snap's Exhibit K Bates: SNAP4928443 ECF No. 1550-23	This exhibit contains sensitive and confidential information about Snap's internal account investigation and age verification practices. Disclosure of this information would provide competitors with insight

Document	Basis for Sealing
	into Snap's practices that they would not otherwise have and thereby cause competitive harm to Snap.
Snap's Exhibit L Bates: SNAP3628554 ECF No. 1550-25	This exhibit contains sensitive and confidential information about Snap's internal account investigation and age verification practices. Disclosure of this information would provide competitors with insight into Snap's practices that they would not otherwise have and thereby cause competitive harm to Snap.
Snap's Exhibit M Bates: SNAP3664752 ECF No. 1550-27	This exhibit contains sensitive and confidential information about Snap's internal account investigations, age verification practices, and cooperation with law enforcement investigations. Disclosure of this information would provide competitors with insight into Snap's practices that they would not otherwise have and thereby cause competitive harm to Snap.
Snap's Exhibit N Bates: SNAP4801937 ECF No. 1550-29	This exhibit contains sensitive and confidential information about Snap's internal account investigations, age verification practices, and cooperation with law enforcement investigations. Disclosure of this information would provide competitors with insight into Snap's practices that they would not otherwise have and thereby cause competitive harm to Snap.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct.

Executed on February 4, 2025.

By: /s/ Laura M. Lopez
LAURA M. LOPEZ